

April 11, 2018

**BY ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: NOTICE OF EX PARTE**

**AU Docket No. 18-85:** *Comment Sought on Competitive Bidding Procedures for Auctions 101 (28 GHz) and 102 (24 GHz)*

**GN Docket No. 14-177, IB Docket Nos. 15-256 & 97-95, RM-11664,**

**WT Docket No. 10-112:** *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al.*

**ULS File Nos. 0007652635 & 0007652637:** *AT&T Mobility Spectrum LLC and FiberTower Corporation Seek FCC Consent to the Transfer of Control of 24 GHz and 39 GHz Licenses*

**ULS File No. 0007783428:** *Verizon Communications and Straight Path Communications Seek FCC Consent to the Transfer of Control of Local Multipoint Distribution Service, 39 GHz, 3650-3700 MHz, and Fixed Point to Point Microwave Licenses*

**WT Docket No. 17-79:** *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment;*

**WT Docket No. 15-180:** *Revising the Historic Preservation Review Process for Wireless Facility Deployment;*

**WC Docket No. 17-84:** *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*

Dear Ms. Dortch:

On April 11, 2018, Courtney Neville and I of Competitive Carriers Association (“CCA”)<sup>1</sup> met with Will Adams, Legal Advisor to Federal Communications Commission (“FCC” or “Commission”) Commissioner Brendan Carr to discuss the above-referenced proceedings.

At its April Open Meeting, the Commission will consider a Public Notice<sup>2</sup> to propose application and bidding procedures for the auctions of millimeter wave (“mmW”) licenses in the 28 GHz and 24 GHz bands. CCA applauds the FCC’s efforts to facilitate access to additional spectrum resources and provided tailored recommendations to ensure all carriers can efficiently deploy next-generation technologies using vital mmW

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<sup>1</sup> CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents associate members including vendors and suppliers that provide products and services throughout the mobile communications supply chain.

<sup>2</sup> FCC Fact Sheet, Public Notice, AU Docket No. 18-85 (rel. Mar. 27, 2018) (“Draft Public Notice”).

spectrum consistent with our previous advocacy in these proceedings.<sup>3</sup> CCA also encouraged the Commission to quickly resolve its pending Applications for Review, or in the alternative Petitions for Reconsideration, of the AT&T Mobility Spectrum LLC and FiberTower Spectrum Holdings LLC transaction, and the transfer of spectrum from Straight Path to Verizon Wireless.<sup>4</sup> The FCC must protect against the anti-competitive effects of a first-mover advantage in critical mmW bands, and ensure that all carriers are afforded an opportunity to access 5G spectrum at auction.

Additionally, CCA encouraged the FCC to expeditiously address remaining barriers to infrastructure siting processes to further deployment of next-generation and 5G technologies. CCA applauds the FCC's work to adopt the Second Report and Order which takes significant steps to streamline the historic and environmental review processes for the benefit of urban and rural consumers alike.<sup>5</sup> The Commission should therefore further address remaining obstacles to state and local siting processes.<sup>6</sup>

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's rules. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

*/s/ Rebecca Murphy Thompson*

Rebecca Murphy Thompson  
EVP & General Counsel  
Competitive Carriers Association

cc (via email): Will Adams

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<sup>3</sup> See, e.g., Comments of Competitive Carriers Association, GN Docket No. 14-177 *et al.* (filed Jan. 23, 2018); Letter from Rebecca Murphy Thompson, EVP & GC, CCA, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 14-177 (Nov. 9, 2017).

<sup>4</sup> See, Application for Review, or in the Alternative, Petition for Reconsideration of Competitive Carriers Association, ULS File Nos. 0005207557 *et al.* (filed Feb. 26, 2018) ("CCA Application for Review of AT&T/FiberTower Remand Order"); Application for Review, or in the Alternative, Petition for Reconsideration of Competitive Carriers Association, ULS File Nos. 0007652635 *et al.* (filed Mar. 12, 2018) ("CCA Application for Review of AT&T/FiberTower Consent Order"); Application for Review, or in the Alternative, Petition for Reconsideration of Competitive Carriers Association, ULS File No. 0007783428 (filed Feb. 20, 2018) ("CCA Verizon-Straight Path Application for Review").

<sup>5</sup> *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, Second Report and Order, WT Docket No. 17-79 (rel. Mar. 30, 2018).

<sup>6</sup> See, Comments of Competitive Carriers Association, WT Docket No. 17-79 (filed June 15, 2017).